

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

AMERICAN ENVIRONMENTAL
ENTERPRISES, INC., d/b/a THE
SAFETYHOUSE.COM,

Plaintiff,

v.

MANFRED STERNBERG, ESQUIRE, and
MANFRED STERNBERG & ASSOCIATES, PC,
and CHARLTON HOLDINGS GROUP, LLC, and
SHLOMO GROSS a/k/a SAMUEL GROSS, and
GARY WEISS, and A.SOLAR, LLC, and
DAPHNA ZEKARIA, ESQUIRE, and
SOKOLSKI & ZEKARIA, P.C.

Defendants

CIVIL ACTION

No. 2:22-CV-0688 (JMY)

**ANSWER OF DEFENDANTS, DAPHNA ZEKARIA, ESQUIRE, and SOKOLSKI &
ZEKARIA, P.C. TO PLAINTIFF'S MOTION TO COMPEL
DISCOVERY AND FOR SANCTIONS**

Defendants, Daphna Zekaria, Esquire, and Sokolski & Zekaria, P.C., by and through their attorneys, Rebar Kelly, hereby file this within Answer to Plaintiff's Motion to Compel and for Sanctions and in support thereof state as follows:

1. Admitted.
2. Denied. Plaintiff's Complaint, as a written document, speak for itself.
3. Denied. Plaintiff's Complaint, as a written document, speaks for itself.
4. Denied. Plaintiff's Complaint, as a written document, speaks for itself.
5. Denied. Plaintiff's Complaint, as a written document, speaks for itself.
6. Denied. The allegations of this paragraph are specifically denied by Answering

Defendants.

7. Denied. The allegations of this paragraph are specifically denied by Answering Defendant.

8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted.

12. Admitted.

13. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

14. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

15. Denied. The exhibits referred to herein, as written documents, speak for themselves.

16. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

17. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

18. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

19. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

20. Denied. The allegations of this paragraph are specifically denied by Answering Defendants.

GOOD FAITH CERTIFICATION OF COUNSEL

21. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied.

RELIEF REQUESTED

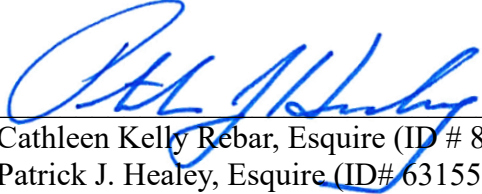
22. Denied. Exhibit “C”, as a written document, speaks for itself.

23. Denied. The allegations of this paragraph constitute legal conclusions which will be deemed to be denied without further response.

24. Denied. The allegations of this paragraph are specifically denied.

WHEREFORE, Defendants, Daphna Zekaria, Esquire, and Sokolski & Zekaria, P.C., respectfully request that this Honorable Court deny Plaintiff’s Motion and issue an appropriate Order forthwith.

REBAR KELLY



Cathleen Kelly Rebar, Esquire (ID # 82872)

Patrick J. Healey, Esquire (ID# 63155)

470 Norristown Road

Suite 201

Blue Bell, PA 19422

(484) 344-5340

Attorneys for Defendants, Daphna Zekaria,
Esquire and Sokolski & Zekaria, P.C.

DATE: March 28, 2024